

CGB-CC-0081

**Elizabethton church of Christ**  
**137 East C Street**  
**Elizabethton, TN 37643**

Received & Inspected  
DEC 16 2011  
FCC Mail Room

Federal Communication Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Case ID#CGB-CC0081**

Thursday, December 8, 2011

Dear Sirs,

Pursuant to your notification that our "undue burden waver" for closed captioning of "Biblical Viewpoints" TV program has been reversed we are responding with this new application for exemption.

In accordance with the instructions for filing we want to address the four considerations that should result in an "Economically Burdensome Exemption."

**1. What is the nature and cost of the closed captioning for the program?**

- a. Biblical Viewpoints is a religious based program that is broadcast over station WJHL-TV in Johnson City, TN. The program has aired in the area for about thirty years and is totally funded by the free will contributions of several small churches in the viewing area. Each church contributes what they can to keep the show on the air. Enclosed is a **financial accounting of \* FY2010** showing the funds contributed and the cost of airing the program. Note that non-air production cost is \$0 because volunteers do all the production work themselves.

b. The current “air time cost” of the program is \$23,400.00 per year. As stated above all the production labor is volunteer and the monies are given as each congregation can afford. It has been necessary for us to build and maintain a studio for this effort and that is funded by asking again for one time gifts from these same contributors. With the economy as it is we are experiencing great difficulty keeping contributors on board. We maintain no surplus of funds.

**2. What is the impact on the operation of the provider?**

a. Our budgeting for the program is completely consumed. Air time purchased always constitutes about 98% of our cost. All the teachers, video and audio operators are volunteers. There is absolutely no place for us to cut cost. We have two full time employees, one is the minister and one is a secretary. We are completely non-profit. To close caption we would have only two alternatives. We would have to either farm out all the captioning to a third party or tool up to do it in house.

To farm out the program it would cost us about \$200.00 per program or \$10400.00 per year. This is a 50% increase in our total cost. This would also make us lag 4 to 5 weeks behind in being able to air a program thus making us unable to inform the area of upcoming events and meetings which is one purpose of the program. **(Ref. Caption Labs, Columbus Ohio 11/7/2011)**

To tool up and do the closed captioning ourselves we would have to purchase about \$5000.00 in software up-front and pay a \$500/year subscription to keep it updated. We would also have to hire (if we could find) someone to work one day a week typing the transcript

and stamping the closed captioning. Finding this individual and compensating them would be a difficult task. (Ref. CPC Captioning, Rockville, MD 12/1/2011)

**3. What financial resources might we solicit?**

- a. The local station, WJHL, was approached and they even farm out their captioning by in large and could offer us no assistance.
- b. We request additional assistance every year from the area churches and they are even cutting back instead due to the financial situation in most churches.
- c. We have nowhere else to turn.

**4. What type of operation is involved?**


All we do is preach and teach God's word as revealed in The Holy Scriptures.

We are in complete agreement with the goals of the FCC effort.

We will work faithfully to grow our congregations and make every effort to move in the direction of "closed captioning." It is our desire that everyone (including the hearing impaired) have the opportunity to hear the gospel of Christ.

We ask you to provide us an "economical burdensome" exemption for "Biblical Viewpoints" TV program.

Respectfully,

  
George Ellis,  
(elder, Elizabethton church of Christ)



\*..FY 2011 numbers will not be available until January 1 but they are typical.

# Elizabethton church of Christ

## Biblical Viewpoints Financial Accounting 2010

### CONTRIBUTORS

McANDREWS CHURCH OF CHRIST	\$1,000
STATE STREET CHURCH OF CHRIST	\$1,800
19TH STREET CHURCH OF CHRIST	\$600
ABINGDON CHURCH OF CHRIST	\$1,500
ERWIN CHURCH OF CHRIST	\$3,000
INDIVIDUALS	\$815
CENTRAL CHURCH OF CHRIST	\$1,800
LEBANON CHURCH OF CHRIST	\$1,200
CHEROKEE CHURCH OF CHRIST	\$2,400
ELIZABETHTON CHURCH OF CHRIST	\$6,235
MOUNT ZION CHURCH OF CHRIST	\$2,500
BEAVER CREEK CHURCH OF CHRIST	\$550
	\$23,400

### EXPENSES:

NON-AIR PRODUCTION	0
TV-AIR TIME EXPENSE	\$23,400.00
BALANCE	\$0.00

### CONTRIBUTIONS JAN THRU DEC 2010

